

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date: date, 2007

Region: Winston-Salem Regional Office
County: Surry
NC Facility ID: 8600009
Inspector's Name: Ray Stewart
Date of Last Inspection: 04/26/2007
Compliance Code: C/In Compliance With
 Procedural Reqr

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): Vaughan-Bassett Furn Co - Elkin Furniture Facility Address: Vaughan-Bassett Furn Co - Elkin Furniture 501 E. Main Street Elkin, NC 28621 SIC: 2511 / Wood Household Furniture NAICS: 337122 / Nonupholstered Wood Household Furniture Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: 15A NCAC 2D .1111 (Subpart DDDD) PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Numbers: 8600009.06A and 8600009.06B Dates Received: 07/26/2006 and 12/22/2006 Application Type: Renewal and TV-Sig Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 02467/T25 Existing Permit Issue Date: 05/06/2005 Existing Permit Expiration Date: 04/30/2007
Ros Folger Safety Director (336) 835-1711 NC State Rt. 268 Elkin NC, 28621	Michael DeHart Vice President/Plant Manager (336) 835-1711 NC State Rt. 268 Elkin NC, 28621	Barry Branscome Corporate Director of Eng. & Env. Comp. (276) 238-2205 300 E. Grayson Street Galax VA, 24333	
Review Engineer: Mark Cuilla		Comments / Recommendations:	
Review Engineer's Signature:		Issue 02467/T26 Permit Issue Date: date, 2007 Permit Expiration Date: date, 2012	
Date: date, 2007			

I. Purpose of Application

This permitting action is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (**05577T12**) was issued on **November 24, 2004**, and is currently scheduled to expire on **June 30, 2007**. The renewal application was received on **September 29, 2006**, or at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

With this application, the Permittee is notifying DAQ of the following changes:

1. Two permitted emission sources have not yet been constructed and will not be constructed in the future. Those emission units are **ES-13**, one wood/coal/natural gas-fired boiler and **ES-11I**, one lumber-drying kiln. Please remove these two emission sources and associated conditions from the permit; and

2. An initial notification for the Plywood MACT was submitted to DAQ on June 3, 2006. That initial notification listed the HAP emission points subject to the MACT. We have recently identified additional gluing operations that are existing operations but were not listed on the initial notification form. The correct listing of HAP emission points are: three cold presses, five edge banding, three foilers, one roll coater, two hot presses, and eight wood welders.

Consolidated into this permit renewal is a second part of a two-step TV significant modification. Permit application **8600009.06B** was received on **December 22, 2006**, fulfilling a requirement in the existing permit to submit a complete title V permit application within 12 months of start-up of either **ES-7, CD-18, or ES-15** (whichever is first).

II. Facility Description

The facility is a wood furniture manufacturer. Permitted equipment includes woodworking operations, furniture finishing operations and ancillary equipment including boilers and lumber drying kilns. The facility is a major source of VOC emissions and a major source under PSD because it has a potential to emit greater than 250 tons per year of VOCs.

III. History/Background/Application Chronology

July 26, 2006 – Permit application **8600009.06A** was received requesting renewal of the Title V permit. Application was deemed complete for processing.

August 21, 2006 – Received WSRO comments on Title V renewal application from Ray Stewart.

December 22, 2006 – Permit application **8600009.06B** was received as a second step title V significant modification as required by Part II of the current permit (**02467T25**) which requires a complete title V application within 12 months of the startup of either **ES-7, CD-18, or ES-15** (whichever is first). Application was deemed complete for processing and consolidated into the renewal application (**8600009.06A**).

September 14, 2007 – DRAFT permit sent to Permittee and Regional Office for comment prior to public notice and EPA review. Spoke with Barry Branscome on **October 17, 2007** and received his comments on the DRAFT permit. There were no real required changes as a result.

date, 2007 – DRAFT permit sent to 30-day public notice and 45-day EPA review.

IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the renewal process.

Page(s)	Section	Description of Change(s)
Attachment	Insignificant activities	-added ID Nos.
Cover	-	-amended all dates and permit revision numbers
All	Header	-amended permit revision number
3-5	Equipment table	-removed all references to ES-11I and ES-13 per Permittee -added boiler description clarifications -added MACT Subpart designations to applicable equipment
6	2.1 A 2.1 A.2.a	-amended equipment description -added ID Nos. and updated shell language

Page(s)	Section	Description of Change(s)
7	2.1 A.2.b-h 2.1 A.2.c 2.1 A.2.d 2.1 A.2.e 2.1 A.2.f 2.1 A.2.g 2.1 A.2.h	-reordered paragraph designations -updated shell language -updated testing date requirement -added ID Nos. and updated shell language -added ID Nos. and updated shell language -added ID Nos. -updated shell language
8	2.1 A.3.a 2.1 A.3.c 2.1 A.3.d 2.1 A.3.e 2.1 A.3.f	-added ID Nos. -updated testing date requirement -added ID Nos. and updated shell language -added ID Nos. and updated shell language -added ID Nos.
9	2.1 A.3.g 2.1 A.4.a 2.1 A.4.d 2.1 A.4.e.iii 2.1 A.4.f	-updated shell language -added ID Nos. -added ID Nos. -updated shell language -updated shell language
10	2.1 A.5.a 2.1 A.5.c 2.1 A.5.d 2.1 A.5.e	-updated shell language -updated shell language -updated shell language -updated shell language
11	2.1 B 2.1 B (table) 2.1 B.2.a 2.1 B.2.b 2.1 B.2.c	-amended equipment description -corrected rule citations -added ID Nos. and updated shell language -updated shell language -updated testing date requirement
12	2.1 B.2.d 2.1 B.2.e 2.1 B.2.f 2.1 B.2.g 2.1 B.3.a	-added ID Nos. and updated shell language -added ID Nos. -added ID Nos. -updated shell language -added ID Nos.
13	2.1 B.3.c 2.1 B.3.d 2.1 B.3.e 2.1 B.3.f 2.1 B.3.g 2.1 B.4.a	-updated testing date requirement -added ID Nos. and updated shell language -added ID Nos. -added ID Nos. -updated shell language -added ID Nos.
14	2.1 B.4.c 2.1 B.4.d.iii 2.1 B.4.e 2.1 B.5.a	-added ID Nos. -updated shell language -updated shell language -updated shell language
15	2.1 B.5.c 2.1 B.5.d 2.1 B.5.e 2.1 B.6.a	-updated shell language -added recordkeeping requirements -added reporting requirements -added ID Nos.
16	2.1 B.6.c 2.1 B.6.d	-added ID Nos. -amended PSD avoidance equation -added ID Nos.

Page(s)	Section	Description of Change(s)
17	2.1 C (old) 2.1 C (new) 2.1 C (table) 2.1 C.1.b	-removed Section per Permittee (renumbered subsequent sections) -amended equipment description -clarified emission limit language -updated shell language
18	2.1 C.1.c 2.1 C.1.e 2.1 C.2.b 2.1 C.2.c	-added ID Nos. -updated shell language -corrected cross reference -added ID Nos. and updated shell language
19	2.1 C.2.d 2.1 C.2.e 2.1 C.3.c 2.1 C.3.d	-added recordkeeping requirements -added reporting requirements -added monitoring requirements -corrected cross reference
19-20	2.1 C.3.e	-corrected cross reference
20	2.1 D	-renumbered Section and amended equipment descriptions
21	2.1 D.1.b 2.1 D.1.c 2.1 D.1.e 2.1 D.2.b	-updated shell language -added ID Nos. -updated shell language -corrected cross reference
22	2.1 D.2.c 2.1 D.2.e 2.1 E 2.1 E (table)	-added ID Nos. and updated shell language -updated shell language -renumbered Section and amended equipment descriptions -added MACT Subpart title and emission limit
23-26	2.2 A	-added ID Nos. where needed
26	2.2 B	-updated shell language
27-36	General Conditions	-updated shell conditions (v2.19)

The following table indicates the modifications to ESM as a result of this permit renewal:

Current Description	Change resulting from permit renewal
One lumber-drying kiln (110,000 board feet capacity every two weeks; ID No. ES-11I)	End-dated per Permittee request
One wood/coal/natural gas-fired boiler (28.7 million Btu per hour maximum heat input; ID No. ES-13)	End-dated per Permittee request
One multicyclone (15 nine inch diameter tubes; ID No. CD-14)	End-dated per Permittee request
One multicyclone (15 nine-inch diameter tubes; ID No. CD-15)	End-dated per Permittee request
One No. 2 fuel oil-fired boiler (38.3 million Btu/hour maximum permitted heat input rate; ID No. ES-TB1)	End-dated as permit does not reflect boiler's existence
NA	<i>One 1,000 gallon gasoline above ground storage tank (ID No. IES-AST)</i>

Other miscellaneous ESM changes include: adding MACT designations to all applicable equipment, reorganizing separate control systems into one control system per source, capitalizing descriptions where needed

V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0503, Particulates from Fuel Burning Indirect Heat Exchangers
15A NCAC 2D .0504, Particulates from Woodburning Indirect Heat Exchangers
15A NCAC 2D .0512, Particulates from Miscellaneous Wood Products Finishing Plants
15A NCAC 2D .0516, Sulfur Dioxide Emissions from Combustion Sources
15A NCAC 2D .0521, Control of Visible Emissions
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart JJ)
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions
15A NCAC 2Q .0317, Avoidance Conditions (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

A regulatory review for these existing requirements will not be included in this document.

As a result of this permit renewal, the following regulation has been added:

15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart DDDD)

VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

NSPS – The facility is not currently subject to any New Source Performance Standards. This permit renewal does not affect this status.

NESHAPS/MACT – The facility is currently subject to the Maximum Achievable Control Technology (MACT) Standards for Wood Furniture Production (40 CFR 63, Subpart JJ). The facility's current finishing operations, cleaning operations, and contact adhesive operations are subject to this Subpart. The specific emission limitations for each process, monitoring requirements, recordkeeping requirements, and reporting requirements are all currently specified in the permit. These conditions have been accepted by both DAQ and the Furniture Industry. This permit renewal does not affect this status.

As part of this renewal, the facility's boilers (**ID Nos. ES-4 and ES-5**; note that **ES-13** is being removed as part of this renewal) were evaluated for applicability to the MACT for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD) as promulgated on **September 13, 2004**. The two remaining boilers are each greater than the 10 million Btu size cut-off for large boilers (29.3 and 29.1 million Btu per hour maximum heat input capacity, respectively) in this Subpart. This would normally place each boiler into an existing, large, solid fuel fired category. However, each boiler is also defined as a firetube boiler. Per EPA guidance, all firetube boilers are classified as small units, regardless of size. Therefore, each boiler falls into the Population I category. These boilers meet the definition of an affected unit under the MACT but have no requirements under the MACT per 63.7506(c)(1). The renewed permit would have noted this in Sections 2.1 A and 2.1 B. However, due to the vacature of the MACT in its entirety, no reference the Subpart has been included.

Also as part of this renewal, the facility's lumber drying kilns (**ID Nos. ES-11A through 11H**; note that **ES-11I** is being removed as part of this renewal) and the gluing operations (**ID No. ES-6**) have been evaluated for applicability to the MACT for Plywood and Composite Wood Production Facilities (40 CFR 63, Subpart DDDD). The eight remaining lumber kilns are all subject to this

MACT because the applicability extends to “lumber kilns located at any facility (that meets the definition of a major facility)” per 63.2231. However, EPA comments in the preamble to the final rule (69FR45944-46045) that “*we felt it was reasonable to include non-located lumber kilns in the PCWP source category because the design and operation of lumber kilns are essentially the same regardless of whether the kilns are located at a sawmill or are collocated with PCWP or other types of manufacturing operations...in addition, we noted that including all lumber kilns in the final MACT results in placing them on a faster schedule for purposes of future residual risk analysis under CAA Section 112(f).*” The preamble goes on to read “*Because the MACT floor determination for lumber kilns is no emission reduction, there will not be a significant monitoring, recordkeeping, and reporting burden for facilities with only non-located lumber kilns...Facilities with non-located lumber kilns that are classified as major facilities of HAP must submit an initial notification form required by the final MACT.*” The Permittee has fulfilled this requirement on June 3, 2006. No additional requirements are necessary for the kilns. This has been noted in the renewed permit.

With the renewal application, the facility submitted a list of additional equipment that it believes is also subject to this MACT. Specifically, three cold presses, five edge banding, three foilers, one roll coater, two hot presses, and eight woodwelders. However, 63.2232(b) defines an affected source as “*the collection of...miscellaneous finishing operations (such as sanding, sawing, patching, edge sealing, and other finishing operations NOT subject to other MACT standards; as defined in 63.2292).*” The current permit lists this equipment as being applicable to the Wood Furniture MACT (Subpart JJ); therefore, compliance with DDDD is not required. This is further supported by Ray Stewart’s April 27, 2006 inspection report in which he indicates “*The only gluing (that may be subject to DDDD) that goes on at the facility is that which is done to fuse wood to low quality solid wood boards or to particleboard...Examination of the CPDS and the MSDS for the wood glue being used indicated that the glue contained no VHAP and was a PVA-based glue very similar in composition to Elmer’s Wood Glue. PVA glues are not regulated by the MACT.*”

It should be noted that on June 19, 2007, the United States Court of Appeals for the District of Columbia Circuit (the Court) vacated EPA's provisions in the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products that established an October 1, 2008, compliance deadline and that created and delisted a low risk subcategory of plywood and composite wood products facilities. The rule was modified to return the compliance date to October 1, 2007. Therefore, the lumber kilns are required to be in compliance by this modified date. As described above, the lumber kilns were in compliance with the submittal of the initial notification. No additional requirements are necessary.

PSD – The facility operates under multiple PSD Avoidance conditions. The following outlines the current requirements.

Wood/coal-fired boiler (ID No. ES-5) –

This boiler is limited to total SO₂ and total nitrogen oxide emissions of less than 40 tons per year each. To ensure compliance with the NO_x limit, the Permittee is not allowed to combust wood and coal simultaneously and the amount of wood combusted annually cannot exceed 10,179 tons per year. To ensure compliance with the SO₂ limit, the sulfur content of the coal cannot exceed 1.2 percent by weight and the amount of coal combusted annually cannot exceed 1,750 tons per year. The Permittee is required to complete monthly emissions calculations and complete semiannual reporting. In his **April 26, 2007** inspection report, Mr. Ray Stewart indicated that the facility was in compliance with these conditions. This permit renewal does not affect this status.

Wood furniture finishing operations (ID Nos. ES-3, ES-12, ES-14, and ES-15) –

Volatile organic compound emissions are limited to less than 40 tons per year from the combination of sources (ID Nos. ES-3, ES-12, and ES-14). In addition, VOC emissions from this source (ID No. ES-15) is limited to less than 40 tons per year. To ensure compliance with these limits, the Permittee is required to complete monthly emissions calculations of amounts of coatings applied, their VOC content, and VOC emissions and complete semiannual reporting. In his April 26, 2007 inspection report, Mr. Ray Stewart indicated that the facility was in compliance with these conditions. This permit renewal does not affect this status.

As part of this permit renewal, Mr. Ray Stewart requested a detailed look at the recent modifications for this facility in order to complete a comparison to the actual VOC emissions as reported in the annual emissions inventories. The facility is an existing major source under the PSD program because it has potential VOC emissions greater than 250 tons per year. The following table contains a summary of all permit actions. It should be noted that the most recent permit modification (T25) added a new PSD avoidance condition. In order to avoid a full PSD review, the Permittee requested a 40-ton per year limit as described above.

Permit Revision Number	Date of Action	Type of Modification	Reason for Modification	Actual VOC Emission (tpy) [Year]
R11	June 11, 1996	State		
R12	July 10, 1997	State	Add ES-12	
R14	July 1, 1998	State	Add CD-11 and ES-11	
R15	April 4, 1999	State	Add CD-16 and 4 kilns	558 [1999]
R16	Nov. 29, 1999	State	Add CD-14 and CD-15	
R17	April 14, 2000	State	Add ES-8	556 [2000]
R18	July 27, 2000	State	Add CD-17 and 3 kilns	
R19	Dec. 15, 2000	State	Replace multiclone	649 [2001]
T20	May 9, 2002	TV Initial	Initial TV	673 [2002]
T21	Oct. 14, 2003	502(b)(10)	Replace cartridge filter	567 [2003]
T22	June 4, 2004	502(b)(10)	Add 3 day tanks	742 [2004]
T23	Oct. 26, 2004	502(b)(10)	Add kiln	
T24	Nov. 17, 2004	Admin. Amend.	Admin. Amend.	
T25	May 6, 2005	501(c)(2)	Add CD-18, ES-7, and ES-15	535 [2005]
-	-	TV Renewal	TV Renewal	577 [2006]

112(r) – The facility is not currently subject to the to the 112(r) “Prevention of Accidental Releases” requirements because it does not store any chemicals in amounts greater that the applicability threshold.

CAM – 40 CFR 64 requires that a continuous compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold, and use a control device to meet an applicable standard. The facility currently employs the following control device/equipment relationships:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-4	One firetube design wood/coal-fired boiler (29.3 million Btu per hour maximum heat input capacity)	CD-1A CD-1B	Two multicyclones (each with 20, nine-inch diameter tubes)
ES-5	One firetube design wood/coal-fired boiler (29.1 million Btu per hour maximum heat input capacity)	CD-2A CD-2B	Two multicyclones (each with 20, nine-inch diameter tubes)
ES-7	Woodworking operations (hog and sanding, storage silo, machine and lathe rooms)	CD-4 and CD-9 CD-5 and CD-6 CD-8 CD-10 CD-16 CD-18	Cyclone #1 (8.6 feet in diameter) in series with one bagfilter (8,294 square feet of filter area) Cyclone #2 (8.6 feet in diameter) in series with one bagfilter (4,408 square feet of filter area) One Micropul RAF II fabric filter (6,900 square feet of filter area) One bagfilter (7,136 square feet of filter area) One bagfilter (5,869 square feet of filter area) One bagfilter (7,555 square feet of filter area)
ES-8	Woodworking operations (cutting, shaping, and sanding)	CD-11 CD-13 CD-17	One bagfilter (6,032 square feet of filter area) One bagfilter (5,235 square feet of filter area) One bagfilter (7,555 square feet of filter area)
ES-9	Expanded sanding operation	CD-12 and CD-8A	One cyclone (13.3 feet in diameter) in series with on Micropul RAF II fabric filter (6,900 square feet of filter area)

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-10	Post sanding operation	CD-9	One bagfilter (8,294 square feet of filter area)

CAM Applicability to boilers (ID Nos. ES-4 and ES-5). The Permittee notes that the boilers are subject to Subpart DDDDD (Boiler MACT Standard), and therefore are exempt from further regulation under CAM. This would only be true in the case of common pollutants. However, because of the vacatur of the MACT, applicability of CAM should be determined. A check against both the wood combustion and coal combustion spreadsheets indicates that each boiler emits less than the major source thresholds for PM₁₀ on a potential pre-controlled basis (ES-4: 36.83 and 64.71 tons per year, respectively/ES-5: 36.58 and 64.27 tons per year, respectively). Therefore, CAM does not apply to these sources.

CAM Applicability to woodworking operations (ID Nos. ES-7 through ES-10). The Permittee notes that the potential to emit for PM₁₀ from each PSEU was determined based on the total wood dust generated by the plant in pounds per hour and distributing that total among the PSEUs (e.g., total plant waste generated estimated based on loading 11-ton trailer in 3 hours = 7333 pounds per hour for each unit). The portion of wood dust that is PM₁₀ is based on “Estimating Emissions from Generation and Combustion of Waste Wood,” Draft, NC DENR, July 15, 1988. The PTE is based on 8,760 hours per year. The following table is a summary of the results along with a CAM applicability notation:

Control Device	% of total wood dust generated	Type of operation	% PM ₁₀ of total generated	PM ₁₀ (tons/year)	CAM Applicable?
CD-6	48	Wood hog/tenons/foilers	0	0	No
CD-8	0	Lathes (were removed)	0	0	No
CD-9	7	Routers/tenons/mold sanders/saws/molders	23.8	26.7	No
CD-10	5	Rip saws/cut-off saws/planers	1.89	30.4	No
CD-11	1	Sanding	23.8	76.4	No
CD-13	7	Router/band saws/shapers	0.37	17.8	No
CD-16	15	Saws/molders	1.89	91.06	No
CD-17	13	Edge bander/router/foiler/mold sander	23.8	79.5	No
CD-18	4	Foilers/saws/tenons/dovetails/profilers	1.89	24.3	No

Example calculation (CD-16):

$$(7333 \text{ lbs/hr}) \times (15\%) \times (0.37\%) \times (8760 \text{ hours/year}) \times (1 \text{ ton}/2000 \text{ pounds}) = 17.8 \text{ tons/year}$$

Therefore, CAM does not apply to these sources.

VII. Facility Wide Air Toxics

The facility is not currently subject to any NC Air Toxics standards. Its lumber kilns make the facility subject to the MACT Standard for Plywood and Composite Materials Production (40 CFR 63, Subpart DDDD) and its boilers make the facility subject to the now defunct boiler MACT (40 CFR 63, Subpart DDDDD). The MACT for lumber kilns would have been the "last MACT" applicable to the facility if the boilers met the definition of a combustion source in 15A NCAC 2D .0702. However, it has been determined that the facility's boilers do not meet the criteria for exemption as a combustion source because they do combust adulterated fuel at times. Therefore the facility's last MACT is the yet to be promulgated boiler MACT. Per 15A NCAC 2Q .0705, a facility has to be in compliance with NC Air Toxics at the same deadline as the last MACT known to apply to the facility. Therefore, no current requirement that the facility submit an air toxics demonstration will be included in the renewed permit.

VIII. Facility Emissions Review

There is no change in emissions for this renewal.

The following table represents the latest years emission inventory from the facility:

Pollutant(s)	2005 Actual Emissions (tpy)	2006 Actual Emissions (tpy)
CO	40.36	42.78
NO _x	35.45	35.95
PM ₁₀	28.24	21.53
SO ₂	16.67	8.47
VOC	535.24	576.80
Total HAPs/TAPs	86.83	102.33

IX. Stipulation Review

Ray Stewart of the WSRO had the following comments on the permit renewal application:

1. Remove boiler (**ID No. ES-13**) and kiln (**ID No. ES-11**). These two emission sources have not been and will not be installed and operated in the future. *Agree, sources will be removed from the permit and end-dated in ESM.*
2. The facility was found to be in likely compliance with all applicable DAQ and federal air quality regulations.
3. Please pay close attention to the Plywood MACT and CAM issues mentioned in the facility's cover letter.

Ray Stewart of the WSRO had the following comments/observations during his latest facility inspection on **April 27, 2006**:

1. No unpermitted equipment that would need to be permitted under DAQ regulations was observed at the facility during the inspection.
2. This boiler (**ID No. ES-13**) has been permitted only within the last five years and has not yet been installed. Mr. Folger of Vaughn stated that he was unsure when the company would have this boiler installed at the facility. *Note that the facility has chosen to remove this boiler from the renewed permit.*
3. These kilns (**ID Nos. ES-11A through ES-11H**) would make the facility subject to the Plywood MACT (40 CFR 63, Subpart DDDD). *Agree, applicability statements will be added to the renewed permit.*

4. The only gluing that goes on at the facility is that which is done to fuse wood to low quality solid wood boards or to particleboard. On an additional note, this operation would be subject to the Plywood and Composite Wood MACT (40 CFR 63, Subpart DDDD). Examination of the CPDS and the MSDS for the wood glue being used indicated that the glue contained no VHAP and was a PVA-based glue very similar in composition to Elmer's Wood Glue. PVA glues are not regulated by the MACT.

5. The facility has reported that its boilers are fire-tube boilers and thus are considered to be existing small units under the Boiler MACT (40 CFR 63, Subpart DDDDD) and are exempt from the standards requirement. The facility will be subject to the Plywood MACT (40 CFR 63, Subpart DDDD) due to its kilns and must be in compliance with that MACT by **October 1, 2007**.

X. Public Notice/EPA and Affected State(s) Review

Pursuant to 15A NCAC 2Q .0521, a notice of the DRAFT Title V Permit shall be placed in a newspaper of general circulation in the area where the facility is located. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. Virginia is an affected State and Forsyth County is an affected Local Program within 50 miles of this facility.

XI. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.

A consistency determination was not required for this renewal.

WSRO recommends issuance of the permit and was presented with a DRAFT permit prior to notice and issuance.

RCO concurs with WSRO's recommendation to issue the renewed air permit.